REMARKS / ARGUMENTS

Claims 1-5, 7-15, 17-25, and 27-34 are pending in the instant application. Claims 1-5, 7-15, 17-25, and 27-31 have been rejected. Claims 32-34 have been allowed. Claims 1-5, 7-15, 17-25 and 27-31 are rejected under 35 USC 102(e) as anticipated by Pettey (Pub. No. 2003/0014544A1, hereinafter "Pettey").

The Applicant respectfully submits that the claims define patentable subject matter.

I. Examiner's Response to Arguments

The Examiner states the following in the Final Office Action:

> Pettey teaches generic buffer (message buffer 533) and transferring incoming data for a TCP connection to said at least one posted generic buffer (the message buffer 533 receives incoming TCP/IP transaction data which includes TCP/IP connections. Pettey, Fig 5; page 10, paragraphs [0088 - 0091].)

See the Final Office Action at page 4. The Applicant points out that Pettey is silent as to the timing of the transfer of any incoming data to a generic buffer that is external to a host adapter. Namely, Pettey, including ¶¶ 0088-0091, does not disclose or suggest that transferring of incoming data for a TCP connection is performed prior to the posting of a TCP application posted buffer for the TCP

connection. In fact, Pettey is silent and does not disclose any details with regard

to the timing of the posting of TCP application posted buffers.

II.   REJECTION UNDER 35 U.S.C. § 102(e)

A.   Independent Claims 1, 11, and 21

The Applicant turns to the rejection of claim 1 under 35 U.S.C. § 102(e) as

being anticipated by Pettey. The Applicant submits that Pettey does not disclose

or suggest at least the limitation of "transferring incoming data for a TCP

connection to said at least one posted generic buffer **prior to the non-posting**

TCP application posting a TCP application posted buffer for said incoming

data," as recited by the Applicant in the independent claim 1 (emphasis added).

With respect to independent claim 1, the Examiner states the following in

the Final Office Action (page 3):

> "Pettey teaches the invention as claimed, including a method for
> posting buffers for a non-posting TCP application, the method
> comprising: posting at least one generic buffer located in a memory
> external to a host adapter (Fig 5; page 10, paragraphs [0088 -
> 0089]); and transferring incoming data for a TCP connection to said
> at least one posted generic buffer prior to the non-posting TCP
> application posting a TCP application posted buffer for said
> incoming data (page 10, paragraphs [0090 - 0091])." (See the
> Office Action at page 5).

The Applicant points out that Pettey discloses efficient TCP/IP transaction from the HCA 502 to the MSG buffers 533 through the DMA logic 504. For example, Pettey states:

> "If acceleration of the connection is granted by the target adapter, then the target adapter sends a remote direct memory access (RDMA) read command to the HCA 502 designating the memory addresses of the applicable message buffers 533. Accordingly, the DMA logic 504 reads the message data from the applicable message buffers 533 and provides the data to the TCP-aware target adapter in an RDMA response, thus bypassing the server TCP/IP/MAC processing that is required to deliver the message data to the designated client over a native client LAN." (See Pettey ¶[0093])

The Applicant points out that Pettey's teaching of using RDMA bypassing of the server TCP/IP/MAC processing further substantiates that there is no teaching of "transferring incoming data for a TCP connection to said at least one posted generic buffer". Furthermore, the Applicant points out that Pettey is silent as to the timing of the transfer of any incoming data to a generic buffer that is external to a host adapter. Namely, Pettey, including ¶¶ 0088-0091, does not disclose or suggest that transferring of incoming data for a TCP connection is performed "prior to the non-posting TCP application posting a TCP application posted buffer for said incoming data." In fact, Pettey is silent and does not disclose any details with regard to the timing of the posting of TCP application posted buffers.

Accordingly, independent claim 1 is not anticipated by Pettey and is allowable. Independent claims 11 and 21 are similar in many respects to the method disclosed in independent claim 1. Therefore, the Applicant submits that independent claims 11 and 21 are also allowable over the references cited in the Office Action at least for the reasons stated above with regard to claim 1.

Furthermore, The Applicant reserves the right to argue additional reasons beyond those set forth herein to support the allowability of claims 1, 11, and 21.

B.   Dependent Claims 2-5, 7-10, 12-15, 17-25, and 27-31

Based on at least the foregoing, the Applicant believes the rejection of independent claims 1, 11, and 21 under 35 U.S.C. § 102(e) as being anticipated by Pettey has been overcome and request that the rejection be withdrawn. Additionally, claims 2-5, 7-10, 12-15, 17-25, and 27-31 depend from independent claims 1, 11, and 21, respectively, and are, consequently, also respectfully submitted to be allowable.

Applicant also reserves the right to argue additional reasons beyond those set forth above to support the allowability of claims 2-5, 7-10, 12-15, 17-25, and 27-31.

CONCLUSION

Based on at least the foregoing, the Applicant believes that all pending claims 1-5, 7-15, 17-25, and 27-34 are in condition for allowance. If the Examiner disagrees, the Applicant respectfully requests a telephone interview, and requests that the Examiner telephone the undersigned Attorney at (312) 775-8176.

The Commissioner is hereby authorized to charge any additional fees or credit any overpayment to the deposit account of McAndrews, Held & Malloy, Ltd., Account No. 13-0017.

A Notice of Allowability is courteously solicited.

Respectfully submitted,

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   / Ognyan I. Beremski /

Ognyan I. Beremski, Esq.
Registration No. 51,458
Attorney for Applicant

McANDREWS, HELD & MALLOY, LTD.
500 WEST MADISON STREET, 34TH FLOOR
CHICAGO, ILLINOIS 60661
(312) 775-8000

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